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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RUSSELL LAMONT SLOCUM,

Case No. : 2:19-CV-01640-RFB-BNW

Plaintiff,

vs.

JAE YOUNG SUNWOO; DOE DRIVER; DOE OWNER; DOES I-X; and ROE ENTITIES I-X, inclusive,

Defendants.

**STIPULATION AND ORDER MODIFYING BRIEFING SCHEDULE ON
DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

IT IS HEREBY STIPULATED by and between the parties hereto, Plaintiff, RUSSELL LAMONT SLOCUM, by and through his undersigned counsel, THE 702 FIRM, and Defendant, JAE YOUNG SUNWOO, by and through his undersigned counsel of record, WINNER & SHERROD, that the briefing schedule, regarding Defendant's Motion for Partial Summary Judgment Regarding Plaintiff's Negligence Per Se Action Pursuant to NRS 484C.110 and Claim for Punitive Damages, will be modified. The parties, through their undersigned counsel, hereby

1 stipulate and agree as follows:

2 WHEREAS, on September 10, 2020, Defendant filed their Motion for Partial Summary
3 Judgment Regarding Plaintiff's Negligence Per Se Action Pursuant to NRS 484C.110 and Claim
4 for Punitive Damages ("Motion");

5 WHEREAS, on September 29, 2020, Plaintiff's Counsel filed a Notice of Association of
6 Counsel, confirming the association of Michael C. Kane, Esq. of THE702Firm.

7 WHEREAS, Plaintiff's counsel, upon receipt of the file and review of the deadlines,
8 determined Plaintiff's Opposition to be due on September 30, 2020.

9 WHEREAS, on September 29, 2020, Plaintiff's counsel immediately contacted defense
10 counsel seeking an agreement to modify the briefing schedule for their Motion accordingly;

11 WHEREAS, Plaintiff needs time to prepare their opposition to the Motion;

12 NOW, therefore, the parties hereby STIPULATE that Plaintiff's Opposition to
13 Defendant's Motion for Partial Summary Judgment Regarding Plaintiff's Negligence Per Se
14 Action Pursuant to NRS 484C.110 and Claim for Punitive Damages will be due October 7, 2020.

15 **IT IS SO STIPULATED.**

16 DATED this 29th day of September, 2020.

17 THE702FIRM

18 */s/ Michael C. Kane*

19 MICHAEL C. KANE, ESQ.
20 Nevada Bar No.: 10096
21 BRADLEY J. MYERS, ESQ.
22 Nevada Bar No.: 8857
23 JENNIFER A. PETERSON, ESQ.
24 Nevada Bar No.: 11242
25 *Attorneys for Plaintiff*
26 *RUSSELL LAMONT SLOCUM*

DATED this 29th day of September, 2020.

WINNER & SHERROD

/s/ Justin Zarcone

JUSTIN J. ZARCONE, ESQ.
Nevada Bar No.: 8735
ZACHARY CLAYTON, ESQ.
Nevada Bar No.: 13464
INKU NAM, ESQ.
Nevada Bar No.: 12050
Attorneys for Defendant
JAE YOUNG SUNWOO

27 IT IS SO ORDERED this 30th day of September, 2020.

28 
RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE